



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

January 30, 2015

Mr. Joseph Gormley  
Golder Associates  
200 Century Parkway  
Suite C  
Mt Laurel, NJ 08054

Dear Mr. Gormley:

This letter is in response to the Trinity Industries South Plant (hereinafter referred to as the "Site"), Polychlorinated Biphenyl (PCB) Risk-Based Cleanup Plan – Revised Cleanup Plan Addendum, dated November 26, 2014, provided to the U.S. Environmental Protection Agency Region III (EPA) by Golder Associates Inc., on behalf of Trinity Industries.

It is EPA's understanding that this Risk-Based PCB Cleanup Plan will be incorporated and implemented as an addendum to the overall Site Cleanup Plan that was previously approved (May 24, 2013) by the Pennsylvania Department of Environmental Protection (PADEP).

EPA has reviewed the Revised Cleanup Addendum and finds that based upon the information provided in this plan, it is consistent with the requirements of 40 CFR § 761.61(c) and that the work plan will not pose an unreasonable risk to human health or the environment. EPA hereby approves this PCB cleanup plan for impacted soils at the Greenville, Pennsylvania site. This approval is subject to the conditions and limitations set forth in 40 CFR § 761.61. The approved plan may only be modified with prior written approval from the EPA Regional Administrator.

EPA's approval of this cleanup plan does not in any way constitute a finding by EPA that the Site will be safe or appropriate for any future use, does not insulate the owner or occupant of the Site from action under any applicable law, and does not relieve Trinity Industries, or any other owner or operator of the Site, of its continuing responsibility to comply fully with 40 CFR Part 761. EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing a PCB cleanup activity subject to 40 CFR § 761.61(c). Among other things, the regulations state that "[c]omplete compliance with 40 CFR § 761.61 does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal." 40 CFR § 761.50(b)(3)(ii)(B). Further, "[a]ny person storing or disposing of PCBs is also



responsible for determining and complying with all other applicable Federal, state, and local laws and regulations.” 40 CFR § 761.50(a)(6).


EPA is requesting that a brief summary of the completed cleanup activities, including but not limited to, sampling analytical results, copies of the accompanying analytical chains of custody, field and laboratory quality control/quality assurance checks, copies of manifests, copies of certificates of disposal and total amounts of PCB waste disposed, be submitted within ninety (90) days of completion to:

U.S. Environmental Protection Agency  
Region III  
Grant Dufficy (3LC30)  
Land and Chemicals Division  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

EPA is not requiring a deed notice or other instrument for this removal at this time. Following future RCRA cleanup activities, an environmental covenant executed pursuant to the Pennsylvania Uniform Environmental Covenants Act, Act No. 68 of 2007, Pa. C.S. 6501-6517, may need to be recorded to meet both PADEP and EPA land re-use requirements. If required, a copy of the recorded environmental covenant must be submitted to the EPA Regional Administrator within 60 days of final completion of all RCRA cleanup activities.

Any questions concerning this approval should be directed to Grant Dufficy, Remedial Project Manager, at (215) 814-3455.

Sincerely,



John A. Armstead, Director  
Land and Chemicals Division

cc: Terry Barrett, Trinity Industries, Inc. (via email)  
John O'Hara, PADEP (via email)  
Mark Haney, Golder Associates Inc. (via email)